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February 1, 2022

BY ECF

The Honorable Alison J. Nathan
United States District Court
Southern District of New York
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *United States v. Ghislaine Maxwell*, S2 20 Cr. 330 (AJN)

Dear Judge Nathan:

We write on behalf of our client, Ghislaine Maxwell, to respectfully request a one-week extension of time until Friday, February 11, 2022 to file our post-trial motions. The motions are currently due on Friday, February 4, 2022. We have conferred with the government, which has consented to the requested extension.

The requested extension is necessary because we need to meet with Ms. Maxwell in person to review work product related to the motions. In-person visits at the MDC only recently became available again this week. Due to other commitments, we are unable to meet with Ms. Maxwell until the end of this week. This is the defense's first request for an extension. We would consent to a similar one-week extension for the government to file its response.

Sincerely,

/s/ Christian Everdell
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cc: All Counsel of Record (By ECF)